

**Cuyahoga County Court of Common Pleas**  
**Criminal Court Division**

|   |   |                            |   |
|---|---|----------------------------|---|
| State of Ohio,<br><br>VS.<br><br>Martin Devring |   | Plaintiff<br><br>Defendant | A True Bill<br><br>Indictment For<br><br><b>Tampering with Records (ORC 2913.42) (F3) (1 Count); Dereliction Of Duty (ORC 2921.44) (M2) (1 Count); Interfering with Civil Rights (ORC 2921.45) (M1) (1 Count). Total: 3 Counts.</b> |
| Dates of Offense (on or about)                  | The Term Of Special Grand Jury<br>Commencing March 2019 |                            | Case Number<br><br><b>CR - 19 - 638833</b>  |
| August 28, 2018                                 |   |                            |   |

The State of Ohio,  
Cuyahoga County } SS.

CR19638833-A

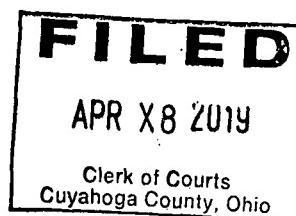
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These offenses occurred in the Cuyahoga County Jail, in Cleveland, Cuyahoga County, Ohio.

**Count One**      **Tampering with Records, §2913.42, F3**  
**Defendants**      Martin Devring  
**Date of Offense**      On or about August 28, 2018

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OHIO, do find and present, that the above named Defendant, on or about the date of the offense set forth above, in the County of Cuyahoga, unlawfully did, knowing he had no privilege to do so, and with purpose to defraud or knowing he was facilitating a fraud on Cuyahoga County falsify, destroy, remove, conceal, alter, deface, or mutilate any writing, computer software, data, or record, to wit: Cuyahoga County Jail Record and the writing, data, computer software, or record was kept by or belonged to a local, state, or federal governmental entity. (The defendant stated in a government record on August 28, 2018 in document called Narrative Report, documenting Rounds made by a Correction Officer in the Cuyahoga County Jail that from 10:30am to 12:45 pm rounds were made and all was secure when in fact all was not secure when Joseph Arquillo was clearly in medical distress as captured on a jail video during this time and dying if not dead. Arquillo was pronounced dead at Metro Hospital later in the afternoon dying of a drug overdose) The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



**Count Two**           **Dereliction of Duty, §2921.44, M2**  
**Defendants**        Martin Devring  
**Date of Offense**    On or about August 28, 2018

The grand jurors, on their oaths, further find that the Defendant(s), in the county aforesaid, unlawfully did while being an officer having charge of a detention facility negligently fail to provide persons confined in the detention facility with adequate food, clothing, bedding, shelter, and medical attention. (Instead of providing or seeking to provide medical attention to Joseph Arquillo who lay motionless on the floor next to a shelving unit, the defendant kicked a cot Arquillo was not laying on never checking on the motionless Arquillo) The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

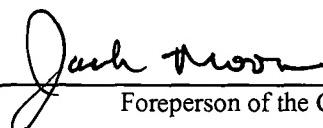
**Count Three**           **Interfering with Civil Rights, §2921.45, M1**  
**Defendants:**        Martin Devring  
**Date of Offense:**     On or about August 28, 2018

The Grand Jurors, on their oaths, further find that the Defendant(s), in the county aforesaid, unlawfully did while being a public servant, under color of office, employment, or authority, knowingly deprive or conspire or attempt to deprive any person of a constitutional or statutory right. (As a correction officer employed in the Cuyahoga County Jail, did violate the civil rights of Joseph Arquillo.) The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

OHIO ATTORNEY GENERAL  
DAVID YOST, SPECIAL PROSECUTOR  
CUYAHOGA COUNTY

BY:

DANIEL I. KASARIS 0042315  
SR. ASSISTANT OHIO ATTORNEY GENERAL  
SPECIAL CUYAHOGA COUNTY PROSECUTOR

  
\_\_\_\_\_  
Foreperson of the Grand Jury

**Cuyahoga County Court of Common Pleas**  
**Criminal Court Division**

|   |                                |              |  |                |
|---|--------------------------------|--------------|--|----------------|
| State of Ohio,                                    |                                | Plaintiff    | A True Bill<br><br>Felonious Assault (ORC 2903.11) (F2) (1 Count);<br>Unlawful Restraint (ORC 2905.03) (M3) (1<br>Count); Tampering With Evidence (ORC<br>2921.12) (F3) (1 Count); Interfering with Civil<br>Rights (ORC 2921.45) (M1) (2 Counts). Total: 5<br>Counts. | Indictment For |
| VS.<br><br>Nicholas D. Evans,<br>Timothy M. Dugan |                                |              |  |                |
|   |                                | Defendants   |  |                |
| Dates of Offense (on or about)                    | The Term Of Special Grand Jury | Case Number  |  |                |
| March 22, 2019                                    | March 2019                     | CR-19-638834 |  |                |

The State of Ohio,  
Cuyahoga County      } SS.

CR19638834-A

108183010



These offenses occurred in the Cuyahoga County Jail, in Cleveland, Cuyahoga County, Ohio.

**Count One**      **Felonious Assault, §2903.11, F2**  
**Defendants**      Nicholas D. Evans, Timothy M. Dugan  
**Date of Offense**      On or about March 22, 2019

The Grand Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OHIO, do find and present, that the above named Defendant, on or about the date of the offense set forth above, in the County of Cuyahoga, unlawfully did knowingly cause serious physical harm to Terrance Debose. (The Defendants strapped Debose in a restraint chair and unlawfully beat him, punching him repeatedly in the head causing a causing a concussion in an incident which was recorded on a wall camera.) The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

**Count Two**      **Unlawful Restraint, §2905.03, M3**  
**Defendants**      Nicholas D. Evans, Timothy M. Dugan  
**Date of Offense**      On or about March 22, 2019

The grand jurors, on their oaths, further find that the Defendant(s), in the county aforesaid, unlawfully did, knowingly and without privilege to do so, restrain Terrance Debose of his liberty. ( Leaving Debose in a restraint chair for over two hours after beating him instead of immediately transporting him to medical.)



**Count Three**      **Tampering With Evidence, §2921.12, F3**  
**Defendants**      Nicholas D. Evans  
**Date of Offense**      On or about March 22, 2019

The grand jurors, on their oaths, further find that the Defendant(s), in the county aforesaid, unlawfully did, knowing that an official proceeding or investigation was in progress, or was about to be or likely to be instituted, alter, destroy, conceal, or remove any record, document, or thing, with purpose to impair its value or availability as evidence in such proceeding or investigation. (Turning his vest camera off so it would not capture the audio and video of the beating he and his co-defendant did upon Terrance Debose ) The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

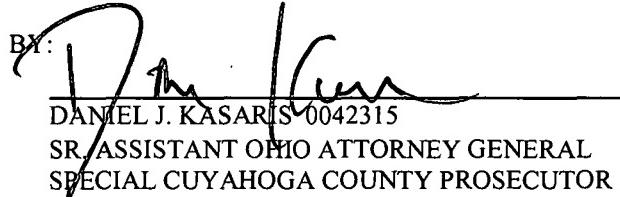
**Count Four**      **Interfering with Civil Rights, §2921.45, M1**  
**Defendants**      Nicholas D. Evans, Timothy M. Dugan  
**Date of Offense**      On or about March 22, 2019

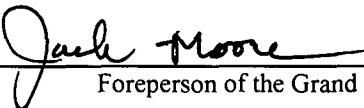
The grand jurors, on their oaths, further find that the Defendant(s), in the county aforesaid, unlawfully did while being a public servant, under color of his office, employment, or authority, knowingly deprive or conspire or attempt to deprive any person of a constitutional or statutory right. (The defendants violated the 4<sup>th</sup> amendment U.S. Constitution rights of Terrance Debose by using unreasonable and excessive force on him) The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

**Count Five**      **Interfering with Civil Rights, §2921.45, M1**  
**Defendants**      Nicholas D. Evans, Timothy M. Dugan  
**Date of Offense**      On or about March 22, 2019

The grand jurors, on their oaths, further find that the Defendant(s), in the county aforesaid, unlawfully did while being a public servant, under color of his office, employment, or authority, knowingly deprive or conspire or attempt to deprive any person of a constitutional or statutory right. (The defendants violated the 5<sup>th</sup> and 14<sup>th</sup> amendment to the U.S. Constitutional rights of Terrance Debose by failing to provide proper medical care to him after they had beaten him causing him a concussion.) The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

OHIO ATTORNEY GENERAL  
DAVID YOST, SPECIAL PROSECUTOR  
CUYAHOGA COUNTY

BY:   
DANIEL J. KASARI #0042315  
SR. ASSISTANT OHIO ATTORNEY GENERAL  
SPECIAL CUYAHOGA COUNTY PROSECUTOR

  
\_\_\_\_\_  
Foreperson of the Grand Jury

**Cuyahoga County Court of Common Pleas**  
**Criminal Court Division**

|  |                         |   |
|--|-------------------------|---|
| State of Ohio,<br><br>Plaintiff<br><br>VS.<br><br>Idris-Farid Clark and<br>Robert P. Marsh<br><br>Defendants |                         | A True Bill<br><br><b>Felonious Assault (ORC 2903.11) (F2) (1 Count);<br/>Assault (ORC 2903.13) (M1) (1 Count);<br/>Interfering with Civil Rights (ORC 2921.45) (M1)<br/>(1 Count); Unlawful Restraint (ORC 2905.03)<br/>(M3) (1 Count). Total: 4 Counts.</b><br><br>Indictment For |
| <b>Dates of Offense (on or about)</b><br><br>July 16, 2018   |                         | <b>The Term Of Special Grand Jury</b><br><br>March 2019   |
| <b>Case Number</b>   | <b>CR - 19 - 638832</b> |   |

The State of Ohio,  
Cuyahoga County } SS.

CR19638832-A

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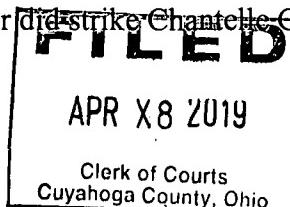
These offenses occurred in the Cuyahoga County Jail, in Cleveland, Cuyahoga County, Ohio.

**Count One**      **Felonious Assault, §2903.11, F2**  
**Defendants**      Idris-Farid Clark  
**Date of Offense**      On or about July 16, 2018

The Grand Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OHIO, do find and present, that the above named Defendant, on or about the date of the offense set forth above, in the County of Cuyahoga, unlawfully did knowingly cause serious physical harm to Chantelle Glass. (The Defendant while Chantelle Glass was compliant and restrained in a restraint chair sprayed at less than a foot ½ a can of pepper foam on the face of Chantelle Glass.) The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

**Count Two**      **Assault, §2903.13, M1**  
**Defendants**      Robert P. Marsh  
**Date of Offense**      On or about July 16, 2018

The Grand Jurors, on their oaths, further find that the Defendant(s), in the county aforesaid, unlawfully did knowingly cause or attempt to cause physical harm to Chantelle Glass. (The defendant while Chantelle Glass was compliant and restrained in a restraint chair did strike Chantelle Glass about her head prior to Pepper



Foam being sprayed upon her face.) The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

**Count Three**           **Interfering with Civil Rights, §2921.45, M1**  
**Defendants:**       Robert P. Marsh, Idris-Farid Clark  
**Date of Offense:**   On or about July 16, 2018

The Grand Jurors, on their oaths, further find that the Defendant(s), in the county aforesaid, unlawfully did while being a public servant, under color of his office, employment, or authority, knowingly deprive or employment, or authority, knowingly deprive or conspire or attempt to deprive any person of a constitutional or statutory right. (As correction officers employed in the Cuyahoga County Jail, these defendants did violate the civil rights of Chantelle Glass.) The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

**Count Four**           **Unlawful Restraint, §2905.03, M3**  
**Defendants:**       Robert P. Marsh, Idris-Farid Clark  
**Date of Offense:**   On or about July 16, 2018

The grand jurors, on their oaths, further find that the Defendant(s), in the county aforesaid, unlawfully did, knowingly and without privilege to do so, restrain Chantelle Glass of her liberty. The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

OHIO ATTORNEY GENERAL  
DAVID YOST, SPECIAL PROSECUTOR  
CUYAHOGA COUNTY

BY:

DANIEL J. KASARIS 0042315

SR. ASSISTANT OHIO ATTORNEY GENERAL  
SPECIAL CUYAHOGA COUNTY PROSECUTOR

*Jane Moore*  
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Foreperson of the Grand Jury